

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

KEVIN BALSLEY,

Plaintiff,

v.

CIVIL ACTION NO.: 3:11cv642

WEST MICHIGAN DEBT COLLECTIONS,
INC, et al.,

Defendants.

CONSENT MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEFS

Defendants West Michigan Debt Collections, Inc., Steven E. Bratschie & Associates, P.C., Steven E. Bratschie, and Michelle Born-Fischer (“Defendants”), by counsel, move the Court to extend the time in which they may file Reply Briefs in Support of their Motion to Dismiss and Motion to Stay. In support of this Motion, Defendants state as follows:

1. On November 14, 2011, Defendants filed a Motion to Dismiss for Lack of Personal Jurisdiction or, in the alternative, Motion to Stay on Abstention Grounds. Plaintiff’s response was originally due on November 28, 2011, but Plaintiff requested an extension of time to file his brief in opposition to December 13, 2011. Accordingly, Defendants’ Reply Brief is now due on December 19, 2011.

2. The undersigned counsel will be on vacation out of the country until December 21, 2011. In light of the intervening holiday, Defendants respectfully request that the Court extend the time for filing their Reply Briefs to December 30, 2011.

3. Plaintiff’s counsel consented to Defendants’ request for an extension. This brief extension of time will not result in prejudice to any party.

WHEREFORE, Defendants West Michigan Debt Collections, Inc., Steven E. Bratschie & Associates, P.C., Steven E. Bratschie, and Michelle Born-Fischer, by counsel, respectfully requests that this Court enter an Order extending the time for Defendants to file their Reply Briefs to December 30, 2011.

**WEST MICHIGAN DEBT COLLECTIONS,
INC., STEVEN E. BRATSCHIE &
ASSOCIATES, P.C., STEVEN E. BRATSCHIE,
AND MICHELLE BORN-FISCHER**
By Counsel

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of December 2011, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Leonard A. Bennett
Gary L. Abbott, Esq.
Counsel for Plaintiff Kevin Balsley
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